

COHEN & GREEN

November 21, 2022

Hon. Frederic Block, Senior Judge
United States District Court
Eastern District of New York
225 Cadman Plaza East, 1214 South
Brooklyn, New York 11201

By Electronic Filing.

Re: Velez v. Prusayev, 22-CV-1810 (FB) (VMS)

Dear Judge Block:

I am co-counsel for Plaintiffs in the above-captioned matter. I write jointly with Defendants, per the Court's Motion Rule 1(D), to request an extension of 60 days more days to apply for costs (inclusive of attorneys' fees under 42 U.S.C. § 1988), consistent with the judgment entered in this case. *See* ECF No. 28. Per the Court's October 21, 2022 Minute Order, the current deadline is November 24 2022. Plaintiffs previously applied for two extensions (ECF Nos. 29 and 30) which the Court granted, making this the third extension. Plaintiffs served a demand and copies of attorney time sheets on September 19, 2022, and are currently waiting for Defendants' counter-offer (which Defendants' counsel needs time to request the required approval to make).

This further time will allow the parties to see if fees can be resolved without litigation. If this motion is granted, the new deadline will be Monday, January 23, 2022.

As always, I thank the Court for its time and attention to this matter.

Respectfully submitted,

/s/

J. Remy Green

Honorific/Pronouns: Mx., they/their/them

COHEN & GREEN P.L.L.C.

Attorneys for Plaintiffs

1639 Centre St., Suite 216

Ridgewood, New York 11385

cc:

All relevant parties by ECF.